

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JEROME BLIGE,)
MARSHELL BERNICE LEE,)
and the ESTATE OF SAUDI)
ARAI LEE, by and through)
MARSHELL BERNICE LEE, its)
Administrator,)

VERSUS)

NO.: 4:24-cv-00131-RSB-CLR

ERNEST FERGUSON,)
IN HIS INDIVIDUAL CAPACITY;)
MACKENZIE RANDLE, IN HIS)
INDIVIDUAL CAPACITY;)
CITY OF SAVANNAH)

JURY TRIAL DEMANDED

EXHIBIT H

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June 6, 2024

Via Electronic Mail Only
spdrecords@savannahga.gov

Records Division
Savannah Police Department
P.O. Box 8032
Savannah, Georgia 31412

Re: Georgia Open Records Request

Dear Sir/Madame:

Please allow this correspondence to serve as my request pursuant to the Georgia Open Records Act Request, (hereinafter "ORA") O.C.G.A. §50-18-70 et seq. I hereby request that, within three (3) business days, as required by the Act, you provide our office with copies of the following:

1. Complete copy of the personnel file of **Officer Ernest Ferugson**, including but not limited to, all IA Records and Investigations, Attendance and Absence Records, Leave of Absence Correspondence (includes vacation time), Time Sheets, Hours Worked Record, Vacation and sick leave records, Yearly leave records, Offer and/ or confirmation of employment letters, Classification review letters addressed to employee, Correspondence between employee and supervisor that relates to employment, Copies of compliance agreements, Disciplinary memos issued to employee, 1-9 documents and supporting documentation, job application and any attachments (resume, etc.), job descriptions, job requisitions, Layoff notice issued to employee, Performance evaluations issued to employee; employee responses thereto, Personnel action forms, Photo ID where required, Resignation letter, ST AP forms and related documents, Termination notice issued to employee, Employee drug and alcohol testing results, Transfer or promotion requests, Years of applicable experience calculation, Disability insurance adjustment forms, Long term disability vouchers, 1-9 documents and supporting documentation, One-time payment and reduction forms, Time sheets, Special salary processing form, Wage attachments or garnishment notices, payroll records, W-4 form, Employee settlement agreements, Employee lawsuits, Employee charges to outside agency, Employee relations advise, Grievance, grievance responses, and grievance-related documents, memo's between management and the

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compensation office, personal financial information (loan applications), and/or records relating to the investigation of a possible criminal offense.

We understand that portions of Officer Ernest Ferguson's file relating to the June 2022 shooting death of Saudi Lee might be a part of an ongoing criminal investigation and not subject to the open records act, but we do expect the Savannah Police Department to comply with the law and produce the remainder of his file.

If my request is denied in whole or in part, the law requires your agency to justify all redactions by reference to the exemptions in the Act, specifying code section, subsection and paragraph. O.C.G.A. § 50-18-71(d). The law requires you to release all other portions of a record that contains exempt material. O.C.G.A. § 50-18-72(b). Please provide a written description of such records, together with a timetable for their inspection and copying. O.C.G.A. § 50-18-70 (f).

The Georgia Open Records Act/Freedom of Information Act Request sets criminal and civil penalties for any person or entity failing to comply with the terms of the Act. O.C.G.A. § 50-18-74. I request within three business days you provide me or a representative with access to, or exact copies of the requested public records – including records in electronic form – or, where no actual official record exists, a complete or accurate account of the information requested. Please inform me prior to making these records available if costs are to exceed \$25.00.

Sincerely,

THE CLAIBORNE FIRM, P.C.

/s/: Kimberly Griffin
KIMBERLY A. GRIFIN
Paralegal for the firm

KAG/slf
Cc: File